

Reichhold Chemicals, Inc.

3320 Lincoln Avenue
Tacoma, WA 98421

WA 2891
12/5/97
17A

REICHHOLD

December 5, 1997

Ms. Mary S. Queitzsch
Assistant Regional Counsel
Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Dear Ms. Queitzsch:

As you requested, this letter outlines a "roadmap" of how Reichhold Chemicals, Inc. (Reichhold) anticipates completing closure at the Tacoma site, and identifies those decisions or actions we believe will be required of the Environmental Protection Agency (EPA). You will notice that many of these issues previously have been discussed in meetings with EPA over the past several months. As the agency makes decisions regarding the points raised in this letter, we request written responses to more clearly document the agency's position.

Background

Reichhold has been working with the regulatory agencies (EPA Region 10 and the Washington State Department of Ecology) since 1986 to investigate, remediate, and permit the Tacoma site. We have conducted numerous investigations over that time, including a RCRA Facility Assessment (RFA) and RCRA Facility Investigation (RFI, referred to as the Preclosure Investigation). After the basic site characterization work was completed in the late 1980s, Reichhold continued to conduct ongoing monitoring and focused investigations as needed to support continuing corrective actions at the site.

Key site cleanup achievements have included installing and operating an interim hydraulic containment system for shallow and intermediate groundwater, closing the wastewater ponds (a RCRA-regulated hazardous waste land disposal unit), remediating two solid waste management units (septic tank area and unit 49), and initiating a soil treatment process for soil from identified pentachlorophenol source areas. This past summer, soil from the former pentachlorophenol plant (a RCRA-regulated unit) and the North Extension (a solid waste management unit) was excavated and placed in treatment cells. To date, Reichhold has excavated thousands of cubic yards of soil from the site, analyzed several thousand soil and groundwater samples, and spent more than \$30 million completing the requirements of the RCRA process and responding to agency and citizen concerns about the site. Our record demonstrates that we have been responsible stewards of the facility under the RCRA program.

Reichhold has developed an approach for closing the facility in a manner protective of human health and the environment such that the site can be redeveloped and again become an asset to the City of Tacoma. Moreover, the Reichhold property is essential to the plans of the Puyallup Tribe for development of a marine terminal. Reichhold would like to work

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with the agencies to close the site and return it to productive use. The remainder of this letter outlines those decisions and actions that are required of EPA to expeditiously close the Reichhold Tacoma site.

Roadmap Summary

Listed below is a summary of the process by which Reichhold proposes to complete corrective action obligations and transfer portions of the property to beneficial use. Anticipated dates for completing the process are also listed. A separate sequence of steps is presented for Parcel A and the remainder of the property, to reflect the different environmental condition of these areas and differing redevelopment plans. Enclosed with this letter are tables listing specific decisions or actions requested of the agency to implement the closure steps outlined below.

Of course, the overriding milestone driving the schedule for many issues is the December 4, 1998 expiration of the facility's RCRA permit. The permit requires Reichhold to file an application for renewal 180 days prior to expiration (June 7, 1998). For Reichhold to meet this schedule several technical issues need to be resolved well in advance of the resubmittal date to provide adequate time to complete technical analyses and prepare the permit renewal application.

Parcel A Closure Steps (Future pre-release facility)

- Agree on soil exposure scenarios (January 1998)
- Concur with Landau report conclusions (January 1998)
- Agree on soil cleanup levels for Parcel A (February 1998)
- Approve Part A permit application splitting Parcel A from facility (March 1998)
- Puyallup International, Inc. (PII) purchase of Parcel A (May 1998)

Parcel B and C Closure Steps (Future marine terminal)

Soil

- Agree on site closure/redevelopment scenario (January 1998)
- Agree on soil exposure scenarios (January 1998)
- Agree on soil cleanup levels (February 1998)
- Incorporate soil cleanup levels into permit resubmittal (June 1998)
- Complete source area remediation (December 2000 - June 2002)
- PII purchase or lease of Parcels B and C (January 1999 - December 2002)









Groundwater

- Agree on ACL concept (January 1998)
- Agree on beneficial use of groundwater (February 1998)
- Agree on technical components of ACL (March 1998)
- Incorporate ACL into permit resubmittal (June 1998)

Site Reference Materials

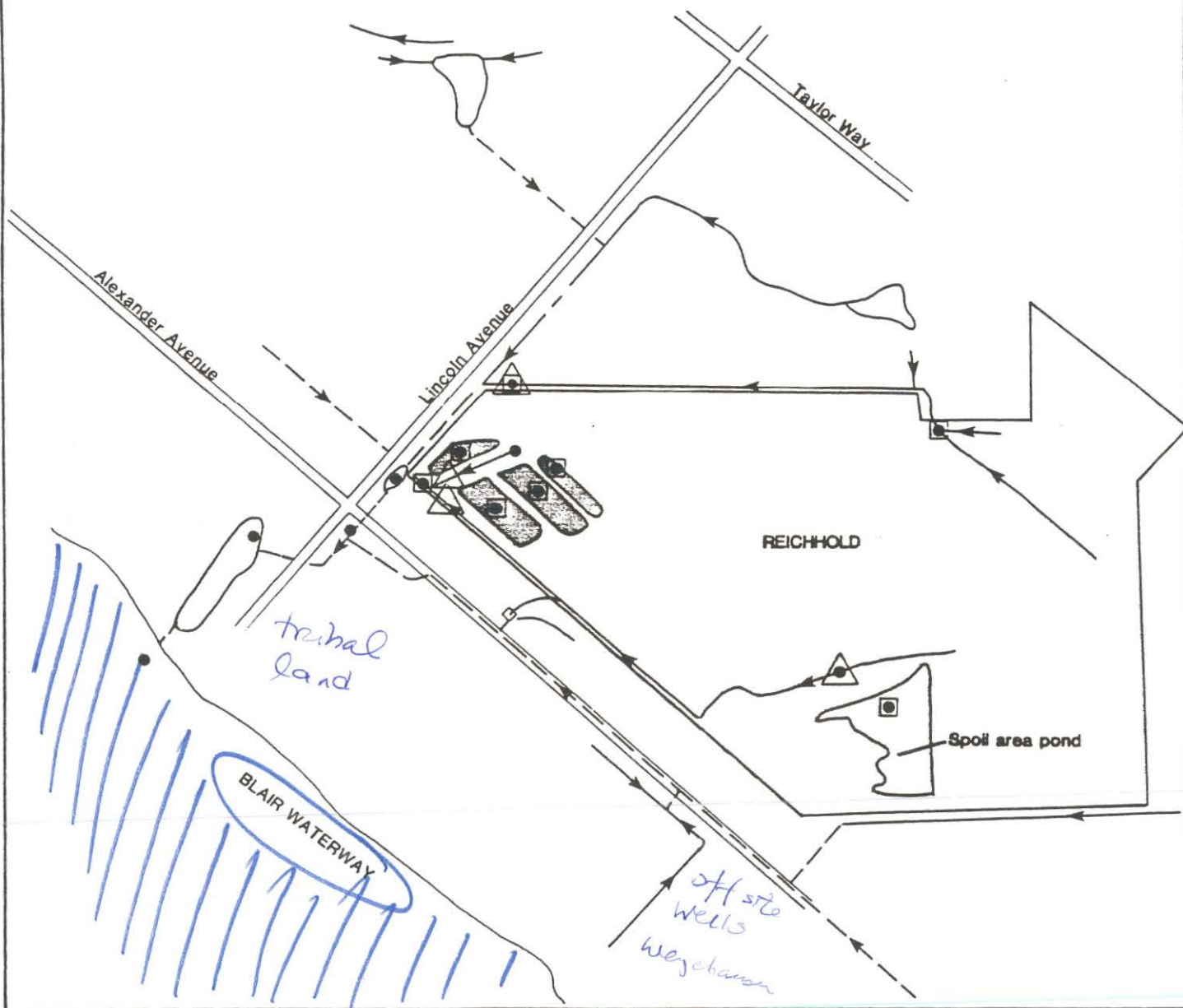
Based on a review of EPA's files in 1996 by our consultant, Reichhold is concerned that EPA staff may not have ready access to all the principal references that describe site

LEGEND

-  Open ditch
-  Culvert
-  Pond or wet area
-  Reichhold property
-  Aeration ponds
-  Surface water station
-  Water sampling location
-  Sediment sampling location

Approximate Scale
1 Inch = 500 feet

Reference: Drainage Map Commencement Bay - Nearshore/
Tideflats Area. By Tacoma - Pierce County
Health Department, July 1, 1983.



Applied Geotechnical Inc.
Geotechnical Engineering
Geology & Hydrogeology

SURFACE WATER PLAN
Reichhold Chemicals, Inc.
Tacoma, Washington

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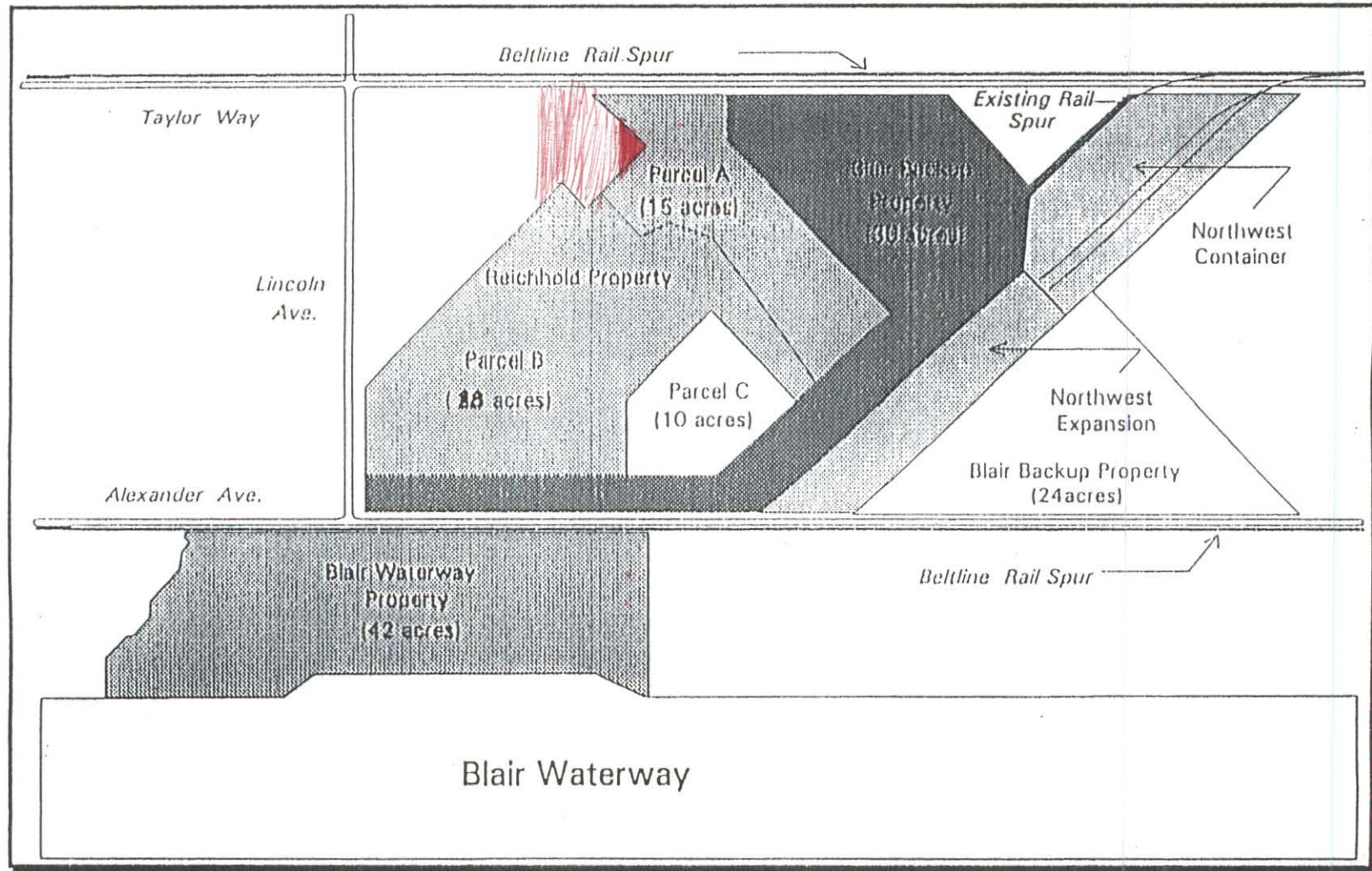
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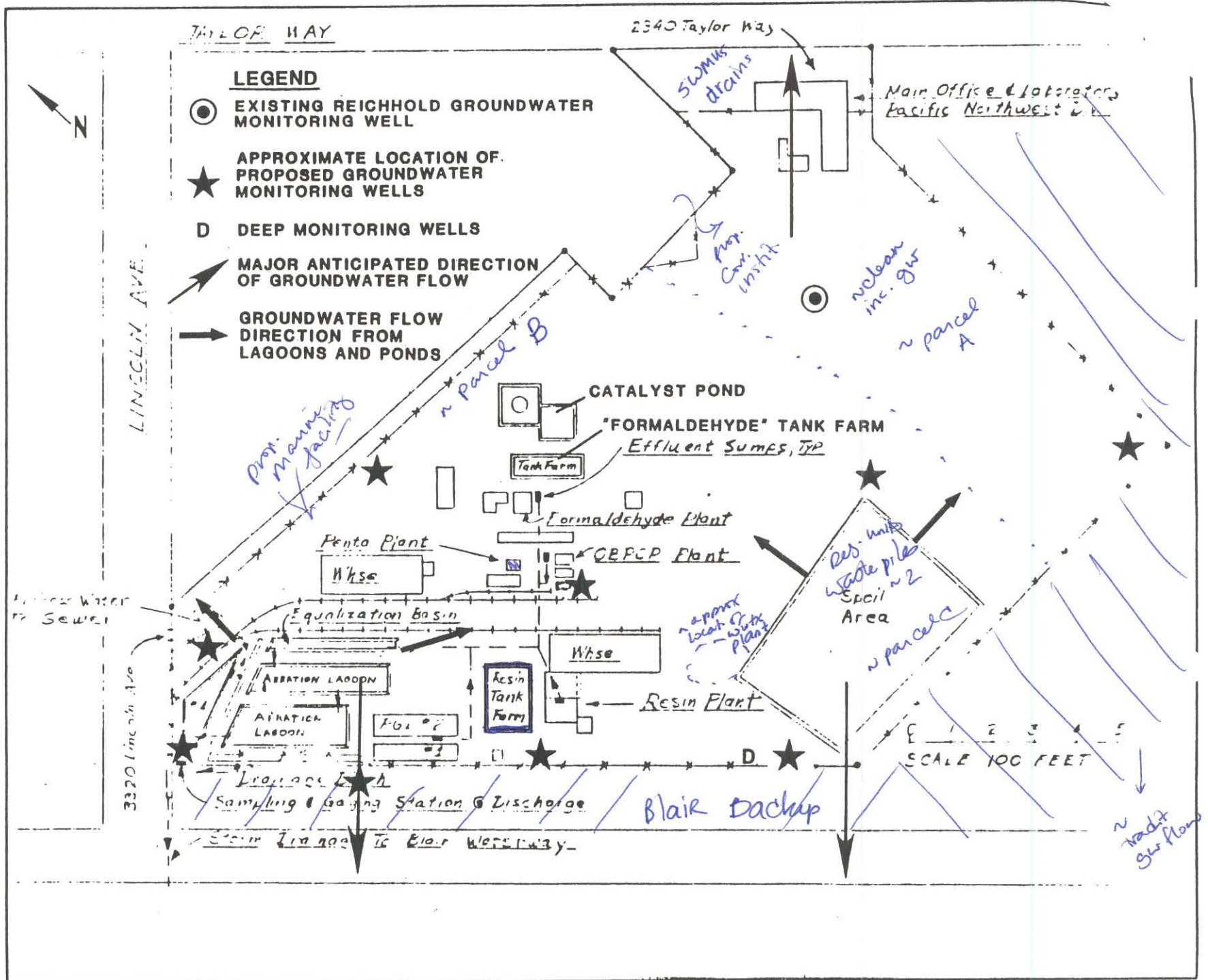
RELATIONSHIP OF BLAIR & REICHHOLD PROPERTIES





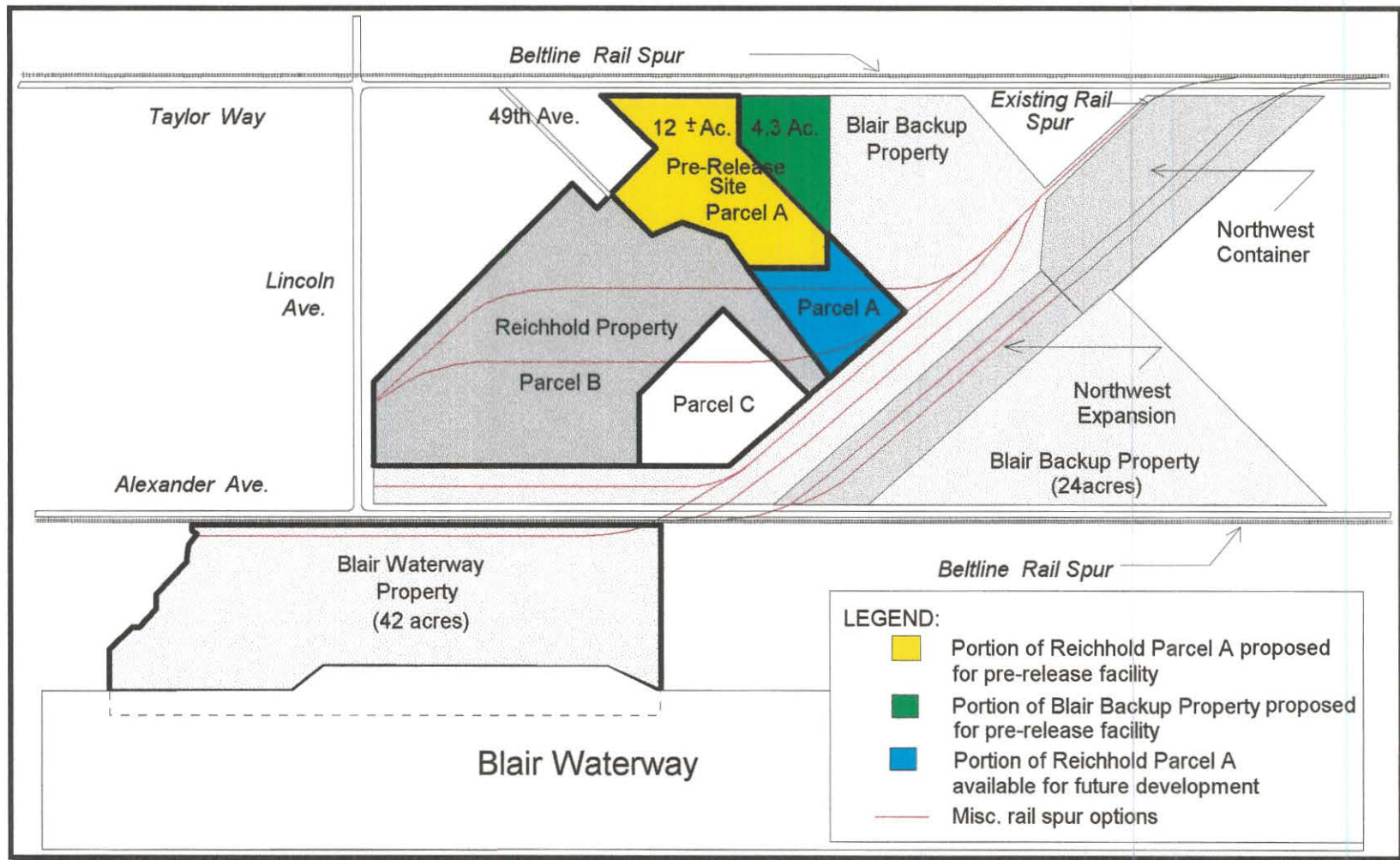
Applied Geotechnology Inc.
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SITE PLAN
Reichhold Chemicals, Inc.
Tacoma, Washington



Blair H₂O Way

RELATIONSHIP OF BLAIR & REICHHOLD PROPERTIES AND PROPOSED PRE-RELEASE SITE LOCATION



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characterization and remediation work over the past decade. Enclosed with this letter is a list of references we believe will be a useful resource for EPA in evaluating the closure approach for the site.

Reichhold appreciates this opportunity to describe for EPA those points that we feel are of key importance in closing and redeveloping the Tacoma site. We look forward to working successfully with the agency in resolving these issues.

If you have any questions regarding this letter or need clarification of any of the points raised, please call me at 919/990-7789, Al Jeroue at 206/624-3214, or Ellen Conedera Dial of Perkins Coie at 206/583-8888.

Sincerely,

Reichhold Chemicals, Inc.

A handwritten signature in cursive script that reads "John J. Oldham".

John J. Oldham
Investment Recovery Manager

enclosures